

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE  
WITNESS DAVID WILLIAMS  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORIES  
(NPMHU/USPS-T1-13 THROUGH 18, 20 AND 21**

The United States Postal Service hereby files the responses of witness David Williams to the above-listed interrogatories of the National Postal Mail Handlers Union dated February 24, 2012. Each interrogatory is stated verbatim and followed by the response. NPMHU/USPS-T1-19, 22 and 23 have been redirected to the Postal Service for institutional responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno, Jr.  
Chief Counsel, Global Business

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2998; Fax -5402  
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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS  
TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-T1-13** Please provide all documents associated with the AMP studies that were listed in <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf>, including the studies that were disapproved.

**RESPONSE**

I am informed that those materials have been provided in USPS Library References N2012-1/73 and NP16.

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**NPMHU/USPS-T1-14** Please explain why the list published by the Postal Service on February 23, 2012 at <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf> contains 264 studies, whereas the list provided as Library Reference 6 contains 252 studies. In your answer, please identify the studies that are contained in February 23, 2012 list but not in Library Reference 6 (including but not limited to Mid-Florida P&DC into Orlando P&DC; Atlanta P&DC; Champaign P&DF; Cardiss Collins P&DC; Staten Island P&DF; Mankato P&DF; Corpus Christi P&DC; and Fort Worth P&DC), and an explanation of why those studies were not contained in Library Reference 6.

**RESPONSE**

Regarding Mid-Florida P&DC into Orlando P&DC, see the response to APWU/USPS-T1-24(b).

The following studies were initiated prior to the mail processing network rationalization effort:

- Atlanta P&DC
- Cardiss Collins P&DC
- Champaign P&DF
- Staten Island P&DF
- Mankato P&DF

The list of facilities under review for consolidation prior to the announcement of the USPS Library Reference N2012-1/6 study list associated with Mail Processing Network Rationalization was provided in USPS Library Reference N2012-1/5.

The following studies were initiated after the December 5<sup>th</sup> filing date after local field review of the preliminary study suggested additional opportunity could exist through changes in the preliminary study list:

- Corpus Christi P&DC
- Fort Worth P&DC

## RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY

**NPMHU/USPS-T1-15** For those sites included in the list published on February 23, 2012 but not included in Library Reference 6, please state whether the full Handbook 408 process was followed for each of these studies, including in your answer the date of the public hearing.

### RESPONSE

See the list below. All of these studies utilized the Handbook 408 process.

Study Facility			Gaining Facility(ies)			Status	Consolidation Type	Public Meeting
State	City	Facility	Gaining Site	City	State			
FL	Mid Florida	Mid-Florida P&DC	Orlando P&DC	Orlando	FL	Approved for consolidation	Originating and destinating	1/4/2012
GA	Atlanta	Atlanta P&DC	North Metro P&DC	Duluth	GA	Study ongoing	Originating	1/19/2010
IL	Champaign	Champaign P&DF	Bloomington P&DF Springfield P&DC	Bloomington; Springfield	IL; IL	Disapproved Study	N/A	(none)
IL	Chicago	Cardiss Collins P&DC	Carol Stream P&DC South Suburban P&DC	Carol Stream; Bedford Park	IL; IL	Approved for consolidation	Originating	11/30/2011
KY	Owensboro	Owensboro CSMPC	Evansville P&DF	Evansville	IN	Approved for consolidation	Destinating	11/3/2011
MI	Gaylord	Gaylord P&DF	Traverse City P&DF	Traverse City	MI	Approved for consolidation	Originating and destinating	10/20/2011
MN	Mankato	Mankato P&DF	Minneapolis P&DC	Minneapolis	MN	Approved for consolidation	Originating and destinating	8/24/2011
MT	Butte	Butte CSMPC	Great Falls P&DF	Great Falls	MT	Approved for consolidation	Destinating	1/3/2012
NY	Staten Island	Staten Island P&DF	Brooklyn P&DC	Brooklyn	NY	Approved for consolidation	Destinating	12/6/2011
PA	Washington	Washington CSMPC	Pittsburgh P&DC	Pittsburgh	PA	Approved for consolidation	Destinating	12/6/2011
TX	Corpus Christi	Corpus Christi P&DC	San Antonio P&DC	San Antonio	TX	Approved for consolidation	Originating and destinating	1/4/2012
TX	Fort Worth	Fort Worth P&DC	North Texas P&DC	Coppell	TX	Approved for consolidation	Originating	12/8/2011

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**NPMHU/USPS-T1-16** Please explain why certain sites (including but not limited to, Burlington VT P&DF, and Manasota, FL P&DC) are included in Library Reference 6, but not included in the list published on February 23, as published at <http://about.usps.com/what-we-are-doing/our-futurenetwork/assets/pdf/communications-list-022212.pdf>.

**RESPONSE**

Burlington VT P&DF is listed on line 243.

Manasota FL P&DC is listed on line 45.

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**NPMHU/USPS-T1-17** Please confirm that the AMP studies for Burlington VT and Manasota, FL P&DC has been disapproved. If not confirmed, please explain the status.

**RESPONSE**

Please see the response to NPMHU/USPS-T1-16.

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**NPMHU/USPS-T1-18** Please confirm that the website identified by witness Susan LaChance on page 6 of her testimony, <http://about.usps.com/streamliningoperations/area-mail-processing.htm>, which provided dates of and links to the proposals for AMP studies and community presentations for public meetings, has been taken down by the Postal Service. If not confirmed, please explain why this statement is incorrect and where on the Postal website this information may now be found. If confirmed, please explain why this information was taken down.

**RESPONSE**

Please see the response to APWU/USPS-T13-5.

## **RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILLIAMS TO NATIONAL POSTAL MAIL HANDLERS UNION INTERROGATORY**

**NPMHU/USPS-T1-20** Please confirm that certain facilities considered for consolidation were not studied through the Handbook 408 process. If confirmed, please state for which facilities the Handbook 408 process was not used; explain the decisionmaking process that was used; and state whether there was a public hearing for each of these facilities.

### **RESPONSE**

USPS Handbook PO-408 guidelines apply to examining the consolidation of all originating and/or destinating operations from a facility. The definition of originating and/or destinating operations is based upon primary distribution of outgoing first class letter and flat mail and incoming Sectional Center Facility (SCF) distribution of letter and flat mail. Facilities that did not undergo the PO-408 review process did not fit the description of performing all primary outgoing and/or all destinating SCF distribution of letter and flat mail for one or more three digit ZIP Codes. The decision making process used was to perform a local financial analysis of the potential savings of the consolidation and to perform a joint Headquarters/Area review of the feasibility of the consolidation. Public hearings were not held for these facilities. PAEA section 302 does not require a public meeting in relation to an operational consolidation. It requires that there at least be public notice and an opportunity to comment. Available summaries of public comments received in relation to non-AMP consolidations are considered before final determinations are made.



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**NPMHU/ USPS -T1-21** Which of the consolidations approved, as listed on the list published on February 23, 2012, are only feasible or beneficial for the Service if the proposed change in service standards currently pending before the Commission is implemented?

**RESPONSE**

The operational changes resulting from each of these consolidations provide the foundation for implementing the proposed service changes. The Postal Service has not conducted analysis on which of these facility consolidations would be be feasible or beneficial in the absence of the proposed service changes.